



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave
Washington, DC 20591

June 15, 2022

Mr. Charles Hunt
300 Haskin Knoll
Peachtree City, GA 30269

Dear Mr. Hunt:

This letter is in response to your October 3, 2021 letter sent to the Federal Docket, Docket No. FAA-2021-0930¹. In your letter, you petitioned the Federal Aviation Administration (FAA) on behalf of yourself, for an exemption from Title 14, Code of Federal Regulations (14 CFR) § 61.160. If granted, the exemption would allow you to be eligible for an airline transport pilot certificate with reduced aeronautical experience (R-ATP) at 1,000 flight hours of total time without completing the required flight training from a part 141 pilot school holding the required letter of authorization (LOA) to issue R-ATP certifying statements. Although you did not specify the specific section within § 61.160 in which you seek relief, the FAA determined that you are referring to § 61.160(b) since it directly references an aeronautical experience minimum of 1,000 hours of total time as a pilot.

You requested relief from § 61.160(b), which states, in pertinent part, that a person may apply for an ATP certificate with an airplane category multiengine class rating or an ATP certificate concurrently with an airplane type rating with a minimum of 1,000 hours of total time as a pilot if the person holds a commercial pilot certificate with an airplane category and instrument rating if:

- (i) The required ground training was completed as part of an approved part 141 curriculum at the institution of higher education (IHE); and
- (ii) The required flight training was completed as part of an approved part 141 curriculum at the IHE or at a part 141 pilot school that has a training agreement under § 141.26 of this chapter with the IHE.

However, the FAA is unable to process your petition. Historically, the FAA does not process relief from § 61.160(b), (c), or (d) to individuals because the request can only be granted to

¹ Charles Hunt - Exemption/Rulemaking, Oct 5, 2021, <https://www.regulations.gov/document/FAA-2021-0930-0001>
AFS-22-00233-E

an IHE, as defined in § 61.1, since an IHE has the authority to certify a graduate's eligibility for an R-ATP certificate under the academic and aeronautical experience requirements in § 61.160. *See*, Gehrig Isaiah Ribeiro (2017)², Rafael Dubena (2018)³, and Brian Rutt (2021)⁴ petitions of exemption.

Therefore, the FAA will take no further action on this petition and close the matter since the petitioner is not eligible to seek relief from § 61.160, as this section is not applicable to the petitioner based on the provided information.

Sincerely,

/s/

Robert C. Carty

Deputy Executive Director, Flight Standards Service

² Gehrig Isaiah Ribeiro - Exemption/Rulemaking, Jul 10, 2017, <https://www.regulations.gov/document/FAA-2017-0486-0004>

³ Rafael Dubena - Exemption/Rulemaking, Feb 23, 2018, <https://www.regulations.gov/document/FAA-2017-1039-0003>

⁴ Brian Rutt - Exemption/Rulemaking, Dec 3, 2021, <https://www.regulations.gov/document/FAA-2021-0731-0002>